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Attorneys for Defendant  
ABSOLUTE DENTAL &  
ORTHODONTICS PRADA, PLLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAULINA KLEIP-SOTELO, an Individual,

Plaintiff,

VS.

ABSOLUTE DENTAL & ORTHODONTICS  
PRADA, PLLC., a Domestic Professional  
Limited Liability Company, DOES I -X; ROE  
CORPORATIONS I -X.,

Defendant.

Case No. 2:20-cv-00021-KJD-DJA

**STIPULATION AND ORDER FOR  
EXCEPTION TO ATTENDANCE  
REQUIREMENT TO EXCUSE  
DEFENDANT'S INSURANCE  
REPRESENTATIVE FROM IN-PERSON  
ATTENDANCE AT THE EARLY  
NEUTRAL EVALUATION**

Defendant ABSOLUTE DENTAL & ORTHODONTICS PRADA, PLLC and Plaintiff PAULINA KLEIP-SOTELO (“Plaintiff”), through their respective counsel of record, submit this Stipulation respectfully requesting an exemption from the Early Neutral Evaluation (“ENE”) in-person attendance requirements for Defendant’s insurance representative.<sup>1</sup>

The Order Scheduling Early Neutral Evaluation (“ENE”) Session (ECF #10) sets the ENE for July 16, 2020, and requires a representative of the insurance carrier with authority to settle this matter up to the full amount of the claim to be present. The assigned adjuster in this matter works in Connecticut and will be unable to fly to Las Vegas due to COVID-19 related travel concerns and restrictions. Thus, the parties request that this Court grant an exemption to the in-person attendance

1 Defendant's client representative from Absolute Dental will be able to attend in-person.

1 requirement for the representative of Defendant's insurance carrier and allow the representative to  
2 participate at the ENE telephonically for good cause.  
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4 Dated: June 22, 2020

5 Respectfully submitted,

Respectfully submitted,

6 /s/ Amy Thompson

7 WENDY M. KRINCEK, ESQ.  
AMY THOMPSON, ESQ.  
8 LITTLER MENDELSON, P.C.

9 *Attorneys for Defendant*

/s/ Jenny L. Foley

JENNY L. FOLEY, Ph.D., ESQ.  
MARTA D. KURSHUMOVA, ESQ.  
HKM EMPLOYMENT ATTORNEYS

*Attorneys for Plaintiff*

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12 **IT IS SO ORDERED.**

13 Dated: June 23, 2020.  
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16 UNITED STATES MAGISTRATE JUDGE  
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